UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO CLEVELAND DIVISION

AIRKO, INC. and LISA MAE) Case No. 1:20-cv-02638-PAB
JENNINGS,	
individually and on behalf of all other	
similarly situated,) JUDGE PAMELA A. BARKER
Plaintiff,)
,) UNOPPOSED MOTION TO MODIFY
v.	CASE MANAGEMENT CONFERENCE
) ORDER
GENERAL MOTORS LLC,	
Defendant	

Now comes General Motors LLC (hereafter "GM"), by and through its undersigned counsel, and respectfully moves this Court to modify the current Case Management Conference Order entered on August 18, 2021 (ECF No. 28).

According to the Case Management Conference Order, plaintiff's expert reports were due to be served no later than Wednesday, October 13, 2021, and GM's expert reports were due two weeks later, on Wednesday, October 27, 2021.

On Wednesday, October 13, 2021, plaintiff produced an expert report from proffered technical expert, Dr. Werner J.A. Dahm, and noted that an expert report from plaintiff's proffered damages expert, Edward Stockton, would be forthcoming.

Plaintiff has yet to produce Mr. Stockton's report. Plaintiff's counsel informed GM this afternoon that they expect to produce the report today, October 25, 2021.

To allow GM sufficient time to review Mr. Stockton's report before producing its own responsive expert report(s), GM respectfully asks that the Court modify the current Case Management Conference Order to extend the deadline for GM to produce its expert reports related

to damages and Mr. Stockton's opinions to November, 8, 2021 or two weeks after plaintiff produces Mr. Stockton's report, whichever is later.

This request is made in good faith and will not affect any other pending deadlines. Plaintiff does not oppose this request.

For the foregoing reasons, the GM respectfully requests that this Court modify the current Court's Scheduling Order.

Respectfully submitted,

s/ April N. Ross

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Attorneys for General Motors LLC

CERTIFICATE OF SERVICE

I hereby certify that on October 25, 2021, I electronically filed the foregoing document with the Court via CM/ECF, which will automatically send notice and a copy of same to counsel of record via electronic mail.

s/ April N. Ross

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